

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

NOTICE OF MARKET-DOMINANT
PRICE ADJUSTMENT

Docket No. R2017-1

**NOTICE OF REVISIONS TO
UNITED STATES POSTAL SERVICE
NOTICE OF MARKET-DOMINANT PRICE ADJUSTMENT,
ATTACHMENT A, AND ATTACHMENT B -- ERRATA
(November 8, 2016)**

On October 12, 2016, the Postal Service filed its notice of market dominant price adjustments in this docket. Revisions to that Notice were filed on October 28, 2016.

Additional changes are discussed below.

Standard Mail

The Postal Service is changing 36 Standard Mail prices, as shown in the attached pages from Attachment A. The changes reflect the Postal Service's response to CHIR 8, which announced that, for expediency, the Postal Service would be aligning the piece price with the piece/pound price at the 4 ounce breakpoint. In making these changes, the Postal Service identified additional breakpoint price discrepancies, and is aligning those prices, too. When changes were made to nonprofit pound cells to maintain the piece/pound price relationships, the same changes had to be made to Commercial pound cells to keep the resulting discounts equal; this resulted in changing 18 commercial pound prices in Flats. All the changes were done to maintain the price relationships between piece and pound rates. These price changes, along with some

corrections to USPS-LR-R2017-1/2 described in a separate errata notice today, increase the price change percentage for Standard Mail from 0.899 percent to 0.900 percent. They also lead to changes in Attachments A and B, provided below.

Summary of Changes

The resulting changes in the text of the October 12 Notice are as follows:

Page 7, Table 3

Standard Mail row, change "0.899" to "0.900"

Page 8, Table 4, Standard Mail section

R2017-1 row, change "0.477" to "0.478"

Total row, change "0.030" to "0.029"

Page 24, Table 8

High Density / Saturation Flats and Parcels row, change "-2.022" to "-2.035"

Flats row, change "2.493" to "2.522"

Overall row, change "0.899" to "0.900"

Page 26, second to last line of page

Change "0.899" to "0.900"

Page 26, last line of page

Change "2.493" to "2.522"

Page 27, fifth line of page

Change "2.493" to "2.522"

Page 27, third to last line of page

Change "2.022" to "2.035"

Page 28, first line of first full paragraph

Change "3.090" to "3.032"

Page 47, sixth line

Change "0.899" to "0.900"

Copies of the revised pages (7-8, 24, 26-28, and 47) of the Notice are attached below. Copy of pages 5, 49, 50, and 54, which were revised on October 28, 2016, are also attached because they were inadvertently omitted from the October 28 Notice of Errata.

The changes to Attachment A are highlighted in yellow (pages 31, 33-34, 48, and 51).

The tabs with changes to Attachment B also are highlighted in yellow. The changes reflect the Standard Mail price changes described above. The revised Attachment B is provided in Excel format, as part of this filing.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**REVISED PAGES FROM NOTICE OF
MARKET-DOMINANT PRICE CHANGE**

Table 1
Available Unused Price Adjustment Authority,
By Mail Class

Class	Unused Authority (%)
First-Class Mail®	0.382 ⁵
Standard Mail®	0.507 ⁶
Periodicals	0.000 ⁷
Package Services	0.179 ⁸
Special Services	1.711 ⁹

C. Overall Price Adjustment Authority

Taking into account the inflation-based and available unused price adjustment authorities, the Postal Service is authorized to raise the prices for each class by the following percentages:

⁵ This figure is the same as the unused authority presented in Order No. 3373, at 11, because the impact of using Docket No. R2017-1 prices is lost in the rounding to three digits.

⁶ The price cap workpapers for Standard Mail in USPS-LR-R2017-1/2 show that the promotions approved in Docket No. R2016-5 will reduce revenue by \$61.1 million, using the proposed prices in Docket No. R2017-1. “CAPCALC-STD-R2017-1”, tab “Promotions”, cell M33. However, the workpapers do not capture the increase in revenue forgone from the \$51 million approved in Docket No. R2016-5 (PRC-LR-R2016-5/2, “prc-lr-r2016-5-2.xls”, tab “Promotions”, cell M33), to \$61 million in the workpapers in this filing. The Postal Service requests that the Commission incorporate this \$10 million increase in promotion revenue forgone as an additional banked amount. This would increase the banked amount from 0.507 percent to 0.566 percent. The Postal Service awaits guidance from the Commission concerning how this should be done consistent with Order No. 3373, at 10-11.

⁷ Order No. 2472, Order on Revised Price Adjustments for Standard Mail, Periodicals, and Package Services Products and Related Mail Classification Changes, PRC Docket No. R2015-4 (Mar. 7, 2015), at 50.

⁸ *Id.* at 58.

⁹ Order No. 2388, Order on Price Adjustments for Special Services Products and Related Mail Classification Changes, PRC Docket No. R2015-4 (Mar. 10, 2015), at 10.

USPS-LR-R2017-1/3	Periodicals Workpapers
USPS-LR-R2017-1/4	Package Services Workpapers
USPS-LR-R2017-1/5	Special Services Workpapers
USPS-LR-R2017-1/NP1	First-Class Mail International Workpapers

Each set of workpapers has a Preface that explains the contents in detail. The Preface in each of the first five workpapers provides an overview, a discussion of any necessary adjustments to the billing determinants for the four quarters ending Q3 Fiscal Year (FY) 2016, and an explanation of the revenue calculations.

E. Percentage Change by Mail Class

As demonstrated in USPS-R2016-7/1 through 5, the prices for each class comply with the price adjustment authority available to the Postal Service.¹⁰ The percentage change by class is as follows:

Table 3
2017 Price Change Percentage By Mail Class

Class	Percent Change
First-Class Mail	0.780
Standard Mail	0.900
Periodicals	0.832
Package Services	1.007
Special Services	2.515

¹⁰ This compliance is also shown by the fact that all of the percent changes in Table 3 are less than the overall price adjustment authority shown in Table 2, for each class of mail.

F. Unused Pricing Authority Resulting From this Price Change

For all five classes, this price change adds to the unused price adjustment authority resulting from prior market dominant price changes under the price cap. The Postal Service calculates the unused price adjustment authority that it will have following this price change as follows:¹¹

Table 4
Unused Pricing Authority Available Following this Price Change

Class	Percentage Points
First-Class Mail	
R2016-5 [1]	0.382
R2017-1 [2]	-0.358
Total	0.024
Standard Mail	
R2016-5 [1]	0.507
R2017-1 [2]	-0.478
Total	0.029
Periodicals	
R2015-4 [1]	0.000
R2017-1 [2]	0.039
Total	0.039
Package Services	
R2015-4 [1]	0.179
R2017-1 [2]	-0.136
Total	0.043
Special Services	
R2015-4 [1]	1.711
R2017-1 [2]	-1.644
Total	0.067

[1] Table 1. For Standard Mail, also see note 4, above.

[2] Cap Calculation worksheets (USPS-LR-R2017-1/1 through 5). The figures show the difference between the newly available inflation-based authority (0.422 percent or 0.871 percent) from Attachment C and the price change amounts in Table 3.

¹¹ To the extent that the calculated percentage change for any class is revised during the course of this proceeding from what has been calculated by the Postal Service in this Notice, the Postal Service notes that the unused price adjustment authority should be adjusted, regardless of the figures set forth in this Table.

volume will be required to move from these two cells to any of the higher price cells.

4. Retail Parcels are reported to reflect the extension of the uniform price to include the maximum weight of 4 ounces. Accordingly, the additional ounces start with the fifth ounce.

4. Standard Mail

Overview:

Standard Mail consists of seven products: Letters; Flats; Parcels; High Density and Saturation Letters; High Density and Saturation Flats and Parcels; Carrier Route; and Every Door Direct Mail - Retail. Within this class, the prices of Standard Mail products change as follows:

Table 8
Standard Mail Product Price Changes

Product	Percent Change
Letters	2.037
Flats	2.522
Parcels	1.583
High Density / Saturation Letters	2.211
High Density / Saturation Flats and Parcels	-2.035
Carrier Route	-3.032
Every Door Direct Mail – Retail	0.568
Overall	0.900

Significant price/classification proposals are discussed in more detail below.

FSS Pricing for Flats:

As discussed in Section (II)(A)(2)(a) above, FSS-specific rates for flat-shaped pieces will be eliminated, particularly those rates related to DFSS entry, FSS Scheme

Service's long term strategy of simplifying the Standard Mail rate structure and adding value to the mailstream (Objective 8, and Factors 1, 6, and 7).

Standard Mail Name Change to USPS Marketing Mail:

Effective January 22, 2017, the name of Standard Mail will change to "USPS Marketing Mail." The 2015 Household Diary Study shows that customers use Standard Mail to send advertisements (84.1% of Standard Mail volumes), funding requests (0.6%), political materials (1.5%), and newsletters/information (12.8%). While the content may differ, each of these uses "markets" a product, service, or the benefit of an event or an organization. Accordingly, this name change will aid our customers in understanding what Standard Mail is and how it can be used as part of their respective marketing strategies (Factor 6).

Standard Mail Flats:

Pursuant to the Commission's order from the Annual Compliance Determination (ACD) Report for FY 2010, the Postal Service must, in each annual market dominant price adjustment, provide: (1) an explanation of how the proposed prices for Standard Mail Flats will move the cost coverage for Standard Mail Flats towards 100 percent; (2) a statement estimating the effect that the proposed prices will have in reducing the subsidy of the Standard Mail Flats product; and (3) all underlying workpapers and data used to respond to parts a and b.²⁹ The responses below comply with this directive.

First, in a year when the average price increase for Standard Mail is 0.900 percent, the Postal Service is increasing the price of Standard Mail Flats by 2.522

²⁹ Docket No. ACR2010, Annual Compliance Determination Report: Fiscal Year 2010, at 107 (March 29, 2011).

percent.³⁰ Assuming that the average cost per piece does not drastically change, the Postal Service believes that this year's above average price change for Flats will improve cost coverage by allowing revenue per piece to rise faster than cost per piece. Second, since the proposed price increase for Flats is larger than the proposed price increase for Standard Mail Letters (2.522 percent vs. 2.037 percent), the Postal Service believes that the cross-subsidy between these two products will be reduced. The above percentages are readily available from this notice and from file "CAPCALC-STD-R2017-1" in library reference USPS-LR-R2017-1/2.

Standard Mail Parcels:

In this price adjustment, Parcels receive an above average price increase of 1.583 percent. The cost coverage for Parcels in FY 2015 was 72.8 percent. This price adjustment continues the Postal Service's previously announced plan to move this product toward full cost coverage (Objective 5 and Factor 2).

High Density/Saturation Flats and Parcels:

In this price adjustment, High Density/Saturation Flats and Parcels receive a 2.035 percent price decrease. The reason for this price decrease is because approximately 480 million Flats pieces weighing between 3.3 and 4.0 ounces that were paying higher pound-rated prices will now be paying lower piece rated prices. This

³⁰ Standard Mail Flats prices are increasing by 268 percent of available pricing authority, which far exceeds what is called for in the price change schedule proposed by the Postal Service in its Annual Compliance Report for FY 2012. See, Docket No. ACR2012, United States Postal Service FY 2012 Annual Compliance Report, at 19 (December 28, 2012). In that price change schedule the Postal Service proposed to increase Standard Mail Flats prices by CPI*1.05 in the 2014, 2015, and 2016 annual market dominant price adjustments. *Id.* The Commission approved this schedule of above average price increases in the ACD for FY 2012. See, Docket No. ACR2012, Annual Compliance Determination Report: Fiscal Year 2012, at 24 (March 28, 2013).

volume shift placed significant downward pressure on these price categories, resulting in an overall price decrease. Had the Postal Service increased piece prices enough to cause an overall price increase for High Density/Saturation Flats and Parcels, this would have defeated the purpose of increasing the maximum weight of piece-rated flats, which is to simplify the rate structure and grow mail volume.

Carrier Route:

In this price adjustment, Carrier Route receives a 3.032 percent price decrease. The reasons for this price decrease are: (1) the movement of approximately 1.9 billion higher-priced flats from FSS-specific rate cells (which are being eliminated) to lower priced Carrier Route rate cells; and (2) the movement of approximately 1.2 billion pound-rated pieces weighing between 3.3 and 4.0 ounces to lower piece-rated prices. These two structural changes exerted an enormous amount of downward pressure on the overall price change for Carrier Route.

Adjustments to the Billing Determinants:

The following adjustments have been made to the billing determinants for Standard Mail:

1. FSS rate cells were eliminated. Volume was shifted to the appropriate 3-Digit, 5-Digit, and Carrier Route cells;
2. The 3-Digit and AADC presort categories were merged for letters. The volume from each of these presort levels was shifted into the new merged category; and

changes in cost avoidance, the plan for reducing these passthroughs to 100 percent is to decrease them by at least 10 percentage points (e.g., from 150 percent to 140 percent) in each subsequent market dominant price adjustment.

If the Postal Service were to reduce all five of the above Standard Letter passthroughs to 100 percent, it would need to increase Standard Mail letter prices by approximately 7.6 percent. With an average price increase of 0.900 percent for the Standard Mail Class, imposing a 7.6 percent price increase on Standard Letters would not only constitute rate shock, but would also necessitate significant price decreases for other Standard Mail products, including Standard Mail Flats.⁴⁴ Accordingly, the Postal Service justifies all of the above passthroughs under section 3622(e)(2)(b). Contingent on price cap availability, operational efficiencies, and changes in cost avoidance, the Postal Service will be mindful to reduce these passthroughs in subsequent market dominant price adjustments.

Finally, the prebarcoding discount for automation letters is 325 percent. The Postal Service notes that the FY 2012 cost avoidance for Standard Mail Automation Mixed AADC Letters was calculated at negative 0.3 cents. This was changed to 0.001 in the FY 2014 ACR and changed again to 0.004 in the FY 2015 ACR. The pre-barcoding discount in this instant case is 0.013. Due to the volatility of these cost avoidance numbers, and the desire of the Postal Service to continue encouraging the pre-barcoding of commercial letters, this passthrough will be gradually moved toward 100 percent in future price adjustments. Given the value of encouraging the

⁴⁴ Pursuant to the Commission's order in the ACD for FY 2016, the Postal Service has been directed to increase Standard Mail Flats' cost coverage by, among other things, implementing "above-CPI price increases" on the product. See, Docket No. ACR2010, Annual Compliance Determination Report: Fiscal Year 2010, at 107 (March 29, 2011).

increase in comparison to the average price increase for the Standard Mail Class, this passthrough is justified under section 3622(e)(2)(B). Contingent on price cap availability, operational efficiencies, and changes in cost avoidance, the Postal Service will be mindful to reduce this passthrough in subsequent market dominant price adjustments.

NDC Marketing Parcels have a passthrough of 115.2 percent, which is also an improvement over the passthrough of 135.2 percent reported in the FY 2015 ACD. Reducing this passthrough to 100 percent in this rate case would have required a 4.6 percent price increase for this price cell. Given the magnitude of this price increase in comparison to the average price increase for the Standard Mail Class, this passthrough is justified under section 3622(e)(2)(B). Contingent on price cap availability, operational efficiencies, and changes in cost avoidance, the Postal Service will be mindful to reduce this passthrough in subsequent market dominant price adjustments.

SCF Marketing Parcels had a passthrough of 105.4 percent. This was an improvement from the passthrough of 109.7 percent reported in the FY 2015 ACD. However, reducing the passthrough to 100 percent in this price case would have required a price increase of 4.6 percent. Given the magnitude of this price increase in comparison to the average price increase for the Standard Mail Class, this passthrough is justified by section 3622(e)(2)(B).

The passthroughs for barcoding (machinable, irregular, and marketing parcels) were all 163.2 percent. This is an improvement over the passthroughs reported in the FY 2015 ACR, which were all 168.4 percent. These discounts are important for

encouraging the pre-barcoding of Standard Mail Parcels. Accordingly, the postal Service justifies these passthroughs under 3622(e)(2)(D).

In the FY 2015 ACD, the Commission stated that if the Postal Service was not able to reduce these passthroughs to 100 percent in the next market dominant price adjustment, then it must contemporaneously “file a plan” for reducing the passthroughs to 100 percent.⁴⁵ Contingent on price cap availability, operational efficiencies, and changes in cost avoidance, the plan for reducing these passthrough to 100 percent is to decrease them by at least 10 percentage points (e.g., from 150 percent to 140 percent) in each subsequent market dominant price adjustment.

Carrier Route Letters:

Two passthroughs for Carrier Route Letters exceed 100 percent. These are the entry discounts. The DSCF entry discount passthrough is 190.0 percent while the passthrough for DNDC letters is 187.5 percent. Both of these passthroughs have improved over what was reported in the FY 2015 ACD – 220 percent and 206.3 percent, respectively. The passthroughs went over 100 percent for first time when pound prices were eliminated for letters in Docket No. R2015-4. Given the Postal Service’s current strategy of pricing Carrier Route Letters the same as Carrier Route Flats, reducing these passthroughs to 100 percent in this price adjustment is more challenging than for other letter entry discounts.

Reducing the entry discount passthroughs to 100 percent in this price adjustment would have required the Postal Service to increase the price of DSCF pieces by 6.1

⁴⁵ Docket No. ACR2015, Annual Compliance Determination Report: Fiscal Year 2015, at 33 (March 28, 2016).

BPM Flats DSCF Dropship:

In this price change, the Postal Service was able to reduce the excess above 100 percent by 30 percent, lowering the passthrough from 110.7 percent to 107.5 percent. This represents a price increase for this dropship category of 3.5 percent and 7.0 percent for Carrier Route and Basic Presort, respectively. Aligning the discount with avoided costs in this case would have required prices to increase by 11.6 percent for Carrier Route and 13.7 percent for Basic Presort, both of which significantly surpass the average increase for the Package Services class in this price change. Therefore, the Postal Service justifies this passthrough pursuant to 3622(e)(2)(B), rate shock.

BPM Flats DDU Dropship:

In this price change, the Postal Service was able to reduce the excess above 100 percent by 37 percent, lowering the passthrough from 111.7 percent to 107.4 percent. This represents a price increase for this dropship category of 0.6 percent and 2.9 percent for Carrier Route and Basic Presort, respectively. Aligning the discount with avoided costs in this case would have required prices to increase by 15.0 percent for Carrier Route and 13.5 percent for Basic Presort, both of which significantly surpass the average increase for the Package Services class in this price change. Therefore, the Postal Service justifies this passthrough pursuant to 3622(e)(2)(B), rate shock.

Bound Printer Matter Parcels:

For Bound Printed Matter Parcels, three workshare discount passthroughs exceed 100 percent: the **DNDC** Bound Printed Matter Parcel passthrough, set at 107.7

**REVISED PAGES FOR
ATTACHMENT A
November 8, 2016**

Saturation Flats (greater than ~~3.34~~ 4.0 ounces)

Charges are computed by multiplying the number of pieces in the mailing by the applicable per-piece price, multiplying the number of pounds of the mailing by the applicable per-pound price, and adding both totals.

a. Per Piece

	Commercial (\$)		Nonprofit (\$)	
	EDDM	Other	EDDM	Other
Per Piece	0.065	0.064	0.026	0.025

b. Per Pound

Entry Point	Commercial (\$)		Nonprofit (\$)	
	EDDM	Other	EDDM	Other
Origin	0.615	0.615	0.445	0.445
DNDC	0.454	0.454	0.284	0.284
DSCF	0.399	0.399	0.229	0.229
DDU	0.363	0.363	0.193	0.193

Saturation Parcels

a. Per Piece

Mailing Volume Tier	Commercial		Nonprofit	
	Small (\$)	Large (\$)	Small (\$)	Large (\$)
0-200,000	0.289	0.333	0.217	0.250
200,001 <u>and above</u> 400,000	0.278	0.322	0.209	0.242
400,001-600,000	0.264	0.308	0.198	0.231
600,001-800,000	0.253	0.297	0.190	0.223
800,000-1,000,000	0.242	0.286	0.182	0.215
Over 1,000,000	0.231	0.275	0.174	0.207

b. Per Pound

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.615	0.445
DNDC	0.454	0.284
DSCF/DFSS	0.399	0.229
DDU	0.363	0.193

High Density Flats (~~3.34.0~~ ounces or less)

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.248	0.167
DNDC	0.208	0.127
DSCF/DFSS	0.194	0.113
DDU	0.185	0.104

High Density Flats (greater than ~~3.34.0~~ ounces)

Charges are computed by multiplying the number of pieces in the mailing by the applicable per-piece price, multiplying the number of pounds of the mailing by the applicable per-pound price, and adding both totals.

a. Per Piece

	Commercial (\$)	Nonprofit (\$)
Per Piece	0.094	0.056

b. Per Pound

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.615	0.445
DNDC	0.454	0.284
DSCF/DFSS	0.399	0.229
DDU	0.363	0.193

* * * * *

Forwarding-and-Return Service

If used in conjunction with electronic or automated Address Correction Service, forwarded flats pay \$1.36 per piece and returned flats the applicable First-Class Mail price. All other pieces requesting Forwarding-and-Return Service that are returned are charged the appropriate First-Class Mail price for the piece plus the price multiplied by a factor of 2.472.

* * * * *

Earned Value Reply Mail Promotion: Flats Only (January 1, 2017 to June 30, 2017)

Provide a \$0.05 per piece rebate on all Business Reply Mail, Courtesy Reply Mail, and ~~Alternate Postage~~ Share Mail pieces that meet program requirements and are placed in the mailstream by the recipient and scanned during the program period. To receive the rebate, registered customers must have distributed a Business Reply Mail, Courtesy Reply Mail, or ~~Alternate Postage~~ Share Mail card or envelope, and must comply with all other eligibility requirements of the program.

Emerging and Advanced Technology Promotion: Flats Only (March 1, 2017 to August 31, 2017)

Provide a two percent discount on the qualifying postage for First-Class Mail presort or automation letters, postcards, and flats, and ~~Standard Mail~~ USPS Marketing Mail letters and flats that are sent during the established program period, and which either include affixed or embedded technology that allows the recipient to engage in a technological experience, or were automatically generated by the recipient's applicable online activities. To receive the discount, mailers must comply with the eligibility requirements of the program.

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b. Per Pound

Commercial						
Entry Point	FSS Scheme Pallet/Container (\$)	FSS Non-Scheme Pallet/Container (\$)	5-Digit (\$)	3-Digit (\$)	ADC (\$)	Mixed ADC (\$)
Origin	0.763	0.763	0.897	0.897	0.897	0.897
DNDC	0.602	0.602	0.737	0.737	0.737	0.737
DSCF	0.554	0.554	0.689	0.689	0.689	n/a
DFSS	0.554	0.554	n/a	n/a	n/a	n/a

Nonprofit						
Entry Point	FSS Scheme Pallet/Container (\$)	FSS Non-Scheme Pallet/Container (\$)	5-Digit (\$)	3-Digit (\$)	ADC (\$)	Mixed ADC (\$)
Origin	0.660	0.660	0.794	0.794	0.794	0.794
DNDC	0.499	0.499	0.634	0.634	0.634	0.634
DSCF	0.451	0.451	0.586	0.586	0.586	n/a
DFSS	0.451	0.451	n/a	n/a	n/a	n/a

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b. Per Pound

Commercial						
Entry Point	FSS Scheme Pallet/Container (\$)	FSS Non-Scheme Pallet/Container (\$)	5-Digit (\$)	3-Digit (\$)	ADC (\$)	Mixed ADC (\$)
Origin	0.763	0.763	0.897	0.897	0.897	0.897
DNDC	0.602	0.602	0.737	0.737	0.737	0.737
DSCF	0.554	0.554	0.689	0.689	0.689	n/a
DFSS	0.554	0.554	n/a	n/a	n/a	n/a

Nonprofit						
Entry Point	FSS Scheme Pallet/Container (\$)	FSS Non-Scheme Pallet/Container (\$)	5-Digit (\$)	3-Digit (\$)	ADC (\$)	Mixed ADC (\$)
Origin	0.660	0.660	0.794	0.794	0.794	0.794
DNDC	0.499	0.499	0.634	0.634	0.634	0.634
DSCF	0.451	0.451	0.586	0.586	0.586	n/a
DFSS	0.451	0.451	n/a	n/a	n/a	n/a

Customized MarketMail Prices

	Commercial (\$)	Nonprofit (\$)
Per Piece	0.443	0.328

* * * * *

REVISED ATTACHMENT B
November 8, 2016

Please see *Workshare Tables (Attach B)Rev11-8.xlsx*,
filed concurrently with this Notice.